

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

3V, INC., a Delaware Corporation,)	
)	
Plaintiff,)	
)	C.A. No. 06-00593-JJF
)	
v.)	
)	
CIBA SPECIALTY CHEMICALS)	
CORPORATION, a Delaware Corporation,)	
)	
Defendant.)	
)	
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CIBA SPECIALTY CHEMICALS)	
CORPORATION, a Delaware Corporation,)	
)	
Plaintiff,)	C.A. No. 06-00672-JJF
)	
v.)	
)	
3V, INC., a Delaware Corporation,)	
)	
Defendant.)	
)	
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CIBA SPECIALTY CHEMICALS)	
CORPORATION, a Delaware Corporation,)	
)	
Cross-Plaintiff,)	C.A. No. 06-00629-JJF
)	
v.)	
)	
3V, INC., a Delaware Corporation,)	
)	
Cross-Defendant.)	
)	

**JOINT STIPULATION AND ORDER TO STAY THE PROCEEDINGS
AND SUSPEND DATES SET FORTH IN NOVEMBER 16, 2007 ORDER**

3V, Inc. (“3V”) on the one side and CIBA Specialty Chemicals Corporation (“CIBA”) on the other side (collectively, the “Parties”) have agreed to the following terms and conditions, subject to the approval of the Court:

WHEREAS, on or about November 16, 2007, the Court entered a Second Order Modifying Rule 16 Scheduling Order (D.I. 30 [06-00593]) and (D.I. 29 [06-00629 and 06-00672]) (the “Order”);

WHEREAS, the Order did not include a trial date or a date for a pretrial conference;

WHEREAS, on or about March 27, 2008, 3V filed a Motion to Dismiss for Lack of Subject Matter Jurisdiction (D.I. 34 [06-00593]) and (D.I. 33 [06-00629 and 06-00672]) in the above-captioned actions;

WHEREAS, the Motion to Dismiss is fully briefed and is pending before the Court;

WHEREAS, CIBA believes that discovery should continue pending resolution of the Motion to Dismiss;

WHEREAS, 3V believes that the Motion to Dismiss negates the need for further discovery;

WHEREAS, rather than litigate the issue of whether discovery should continue at this time, the Parties have agreed to stay the above-captioned matters and suspend all dates set forth in the Order pending the Court’s resolution of the Motion to Dismiss,

NOW THEREFORE, the Parties stipulate and agree, subject to the approval of the Court, to stay these cases and suspend the dates set forth in the Order until such time that the Court resolves the Motion to Dismiss.

Dated: June 25, 2008

/s/ Joseph Grey

Joseph Grey (#2358)
jg@stevenslee.com
STEVENS & LEE, P.C.
1105 North Market Street, Seventh Floor
Wilmington, DE 19801
(302) 654-5180

Angelica M. Colwell
NEXSEN PRUET, LLC
P.O. Box 486
205 King Street, Suite 400
Charleston, SC 29401
Counsel for 3V, Inc.

Dated: June 25, 2008

/s/ Chad M. Shandler

Frederick L. Cottrell, III (#2555)
cottrell@rlf.com
Chad M. Shandler (#3796)
shandler@rlf.com
Richards LAYTON & FINGER
One Rodney Square
P.O. Box 551
Wilmington, DE 19899
(302) 651-77000

Alan E.J. Branigan
Brion Heaney
Michael Culver
Millen White Zelano & Branigan, P.C.
2200 Clarendon Boulevard
Suite 1400
Arlington, VA 22201
Attorneys for CIBA Specialty Chemicals Corporation

IT IS SO ORDERED this ____ day of _____, 2008

United States District Judge